# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

GABRIEL C. CORCHADO PÉREZ,

Civil No.: 18-1381 (BJM)

Plaintiff.

v.

DAIICHI SANKYO DE PUERO RICO ("DSI"); INSURANCE COMPANIES A, B, AND C INC.; JOHN DOE AND RICHARD DOE.

Defendants.

# STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FED. R CIV. P 41(a)(A) (ii)

#### TO THE HONORABLE COURT:

COME NOW all of the parties in the above-captioned complaint, through their respective undersigned counsels, and respectfully inform and pray as follows:

- 1. The parties have reached a private and confidential settlement agreement in which they have agreed to resolve all claims between them.
- 2. As part of the agreement, the plaintiff is voluntarily dismissing the present claim with prejudice. The parties have agreed that no imposition of costs or attorneys' fees will be requested.
- 3. The parties hereby request that this Honorable Court enter judgment dismissing the complaint in its entirety with prejudice, and that an un-appealable judgment be issued dismissing the case.
- 4. The parties further request that the court retain jurisdiction to enforce all aspects of the agreement.

Notice of Voluntary Dismissal With Prejudice Pursuant to Fed. R. Civ. P.41(a)(ii) Civil No. 18-1381 (BJM)

**WHEREFORE**, the parties respectfully request that this Honorable Court enter judgment dismissing the complaint pursuant to the terms requested herein.

#### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of February, 2019.

## **Attorney for Plaintiff**

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